

EXHIBIT B

COUNSEL FOR PLAINTIFF'S TIME ENTRIES

TASK	TIME	RATE	DUE
Paralegal Initial Calls with Plaintiff; Calls & Emails to Follow Up & Obtain Documents from Plaintiff; Review and Summarize	3.2	\$100.00	\$320.00
Paralegal confer with client re: claim process and provide updates (multiple).	1.5	\$100.00	\$150.00
Paralegal enter case deadlines and calendar entries.	1	\$100.00	\$100.00
Paralegal Submit FOIA Request, Confirm Receipts of FOIA Request, Get Results	1	\$100.00	\$100.00
Paralegal Prepare Case Cover Sheets, Summons, General Filing Docs	1.5	\$100.00	\$150.00
Paralegal Confirm ALL Defendants Served, Enter Date of Service on Case Date Tab	0.5	\$100.00	\$50.00
Associate research relevant case law, governing local rules, and application of case specific facts to law.	3.2	\$250.00	\$800.00
Associate Call Plaintiff, Discuss Case Facts & Pay Structure, Calculate Damages	3.5	\$250.00	\$875.00
Associate Draft Complaint	2.5	\$250.00	\$625.00
Associate Case Updates with Client (Multiple)	1.5	\$250.00	\$375.00
Associate discuss with OC re: potential for pay records and exchanging preliminary info (multiple).	1	\$250.00	\$250.00
Associate follow up with client re: additional docs and prepare to send to OC, send to OC.	2.5	\$250.00	\$625.00
Associate Arrange for and Obtain Service	0.75	\$250.00	\$187.50
Associate research company background and prior violations, call potential witnesses, discuss findings with paralegal.	3.5	\$250.00	\$875.00
Associate Draft & File Motion for Pro Hac Vice	0.5	\$250.00	\$125.00
Associate review and produce additional client documents.	2.5	\$250.00	\$625.00
Associate Review GPS records (13 spreadsheets) provided by OC through informal discovery.	9.5	\$250.00	\$2,375.00
Associate Draft Settlement Demand	0.5	\$250.00	\$125.00
Associate Work with OC and Draft Settlement Documents	3.5	\$250.00	\$875.00
Associate discuss potential settlement with client on multiple occasions.	0.75	\$250.00	\$187.50
Total - Associate Review & Draft Correspondence - Total Letters & E-mails (112)	4.5	\$250.00	\$1,125.00
Associate Confer with OC regarding settlement negotiations on multiple occasions.	2	\$250.00	\$500.00
Partner Confer with Associate on Case Management Plan and Provide General Instructions; Discuss Likelihood of Potential for Class/Collective Members	3.5	\$450.00	\$1,575.00
Partner Review Complaint	1	\$450.00	\$450.00
Partner review documents produced by OC regarding payroll and employment status.	2	\$450.00	\$900.00
Partner review GPS records (13 spreadsheets) & Confer with associate.	2.5	\$450.00	\$1,125.00
Partner conferrals with OC re: settlement (multiple).	0.5	\$450.00	\$225.00
Partner Review Associate Findings & Suggestions; Confer.	1	\$450.00	\$450.00
Partner Review Associate Calculations and Demand	1.5	\$450.00	\$675.00
TOTALS			\$16,820.00

COUNSEL FOR PLAINTIFF'S DAMAGE CALCULATIONS

Name	Date	Days	Pay	TS Days/Hrs	Total Hrs	OT Owed	2 Yr Damages	3 Yr Damages
Jason M Minter	9/29/2019	4	2,400.00	4	48	200.00		\$ 200.00
Jason M Minter	10/6/2019	7	4,200.00	6.5	78	1,023.08		\$ 1,023.08
Jason M Minter	10/13/2019	6	3,600.00	6	72	800.00		\$ 800.00
Jason M Minter	10/20/2019	6	3,600.00	6	72	800.00		\$ 800.00
Jason M Minter	10/27/2019	6	3,600.00	5	60	600.00		\$ 600.00
Jason M Minter	11/3/2019	6	3,600.00	6	72	800.00		\$ 800.00
Jason M Minter	11/10/2019	6	3,600.00	6	72	800.00		\$ 800.00
Jason M Minter	11/17/2019	6	3,600.00	6	72	800.00		\$ 800.00
Jason M Minter	11/24/2019	6	3,600.00	6	72	800.00		\$ 800.00
Jason M Minter	12/1/2019	3	1,800.00	3	36	0.00		\$ -
Jason M Minter	12/8/2019	7	4,200.00	7	84	1,100.00		\$ 1,100.00
Jason M Minter	12/15/2019	5	3,000.00	5	60	500.00		\$ 500.00
Jason M Minter	12/22/2019	6.5	3,900.00	6	72	866.67		\$ 866.67
Jason M Minter	1/5/2020	3	1,800.00	3	36	0.00		\$ -
Jason M Minter	1/12/2020	7	4,200.00	7	84	1,100.00		\$ 1,100.00
Jason M Minter	1/19/2020	6.5	3,900.00	6.5	78	950.00		\$ 950.00
Jason M Minter	1/26/2020	7	4,200.00	7	84	1,100.00		\$ 1,100.00
Jason M Minter	2/2/2020	6	3,600.00	6	72	800.00		\$ 800.00
Jason M Minter	6/27/2021	5.5	3,162.50	54.25	54.25	415.35	\$ 415.35	\$ 415.35
Jason M Minter	7/4/2021	5	2,875.00	50	50	287.50	\$ 287.50	\$ 287.50
Jason M Minter	7/11/2021	5	2,875.00	50	50	287.50	\$ 287.50	\$ 287.50
Jason M Minter	7/18/2021	6	3,450.00	64	64	646.88	\$ 646.88	\$ 646.88
Jason M Minter	7/25/2021	6.5	3,737.50	70	70	800.89	\$ 800.89	\$ 800.89
Jason M Minter	8/1/2021	7	4,025.00	71.5	71.5	886.63	\$ 886.63	\$ 886.63
Jason M Minter	8/8/2021	6	3,450.00	67	67	695.15	\$ 695.15	\$ 695.15
Jason M Minter	8/15/2021	5	2,875.00	57.5	57.5	437.50	\$ 437.50	\$ 437.50
Jason M Minter	8/22/2021	4.5	2,587.50	48	48	215.63	\$ 215.63	\$ 215.63
Jason M Minter	8/29/2021	5	2,875.00	57.5	57.5	437.50	\$ 437.50	\$ 437.50
Jason M Minter	9/5/2021	5	2,875.00	51	51	310.05	\$ 310.05	\$ 310.05
Jason M Minter	9/12/2021	4	2,300.00	42	42	54.76	\$ 54.76	\$ 54.76
Jason M Minter	9/19/2021	5	2,875.00	65	65	552.88	\$ 552.88	\$ 552.88
Jason M Minter	9/26/2021	5	2,875.00	55	55	392.05	\$ 392.05	\$ 392.05
Jason M Minter	10/3/2021	5	2,875.00	55	55	392.05	\$ 392.05	\$ 392.05
Total					2081.75	\$ 19,852.05	\$ 6,812.31	\$ 19,852.05

From: Keith Lea
To: [Taylor Montgomery](#); [Richard J Burch](#); [Laurence Stuart](#)
Cc: [Hess-Minter](#); [Andrew Dunlap](#); [Michael A. Josephson](#); [Liliana Landaverde](#)
Subject: RE: Hess v. Minter - Pay Records Request
Date: Monday, August 22, 2022 3:06:20 PM
Attachments: [image002.png](#)
[6.21-6.27.21.xlsx](#)
[6.28-7.4.21.xlsx](#)
[7.5-7.11.21.xlsx](#)
[7.12-7.18.21.xlsx](#)
[7.19-7.25.21.xlsx](#)
[7.26-8.1.21.xlsx](#)
[8.2-8.8.21.xlsx](#)
[8.9-8.15.21.xlsx](#)
[8.16-8.22.21.xlsx](#)
[8.23-8.29.21.xlsx](#)
[8.30-9.5.21.xlsx](#)
[9.6-9.12.21.xls](#)
[9.13-9.19.21.xls](#)
[9.20-9.26.21.xlsx](#)
[9.27-10.3.21.xlsx](#)

Caution! This message was sent from outside your organization.

Taylor:

Attached are the 2021 GPS records from Chippewa. The spreadsheets are maintained by work week matching Minter's timesheets. Work weeks are Monday through Sunday.

You'll see blue and yellow highlighted rows in the attached spreadsheets. Yellow indicates Minter arriving at a location; blue indicates Minter leaving a location.

Thanks,

Keith

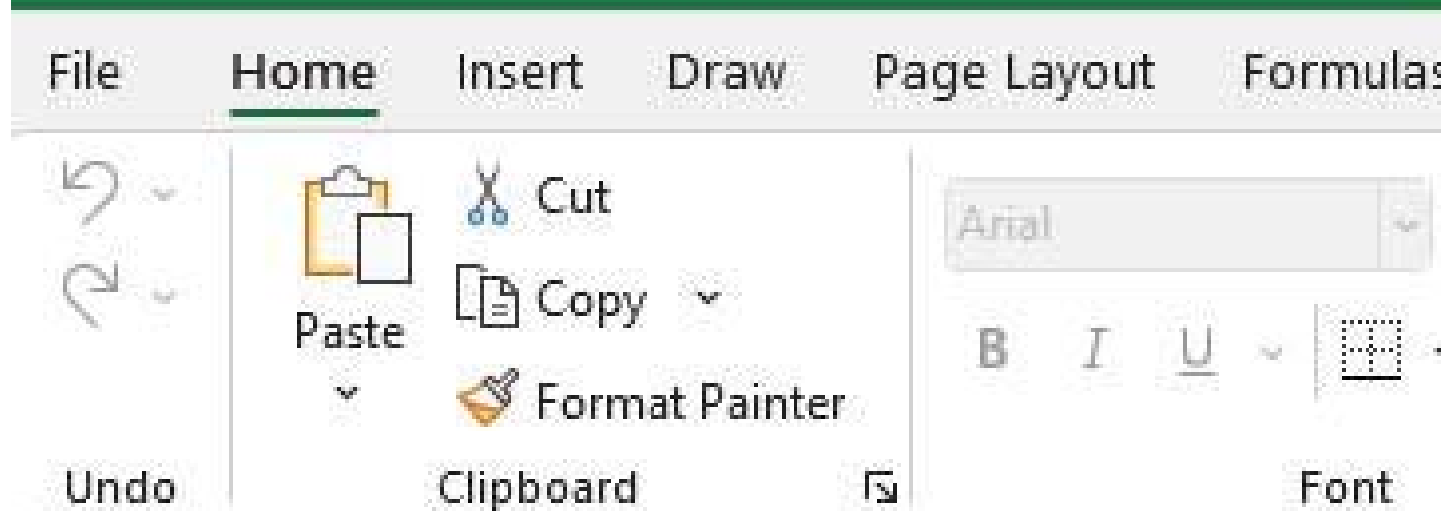
C. Keith Lea

[REDACTED]

STUART_{PC}

[REDACTED]

[REDACTED]



J1136

	A	B	C
1	Report: Activity Detail		
2	Report Run Date/Time	3/9/22 1:49:47 PM CST	
3	Start Date	6/20/21 12:00:00 AM	
4	End Date	6/27/21 12:00:01 AM	
5	Report Time Window	12:00 AM-12:00 AM	
6	Selected Vehicle		
7			
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12	Landm		
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Workbook Statistics

Current Sheet:

End of sheet	AA988
Cells with data	18480
Tables	0
Formulas	0

Workbook:

Sheets	1
Cells with data	18480
Tables	0
Formulas	0

OK